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July 21, 2008

VIA FACSIMILE (212-805-6382)

Hon. Victor Marrero  
 United States District Judge  
 Daniel Patrick Moynihan United States Courthouse  
 500 Pearl Street, Room 660  
 New York, New York 10007

USDS SDNY  
 DOCUMENT  
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re: **Micalden Investments S.A. v. Olga Rostropovich, et al.**  
**Case No. 07 CV 2395 (VM)**

Dear Judge Marrero:

This firm represents defendants Cooley Godward Kronish LLP and Renee Schwartz (together, the "CGK Defendants"). I respectfully request that the time for the CGK Defendants to reply to the cross-claims filed by defendant Olga Rostropovich, and by defendants Atoosa P. Mamdani and Mahmoud A. Mamdani (the "Mamdani Defendants"), be extended through August 29, 2008. The replies to both cross-claims are presently due on July 23, 2008.

The CGK Defendants request this extension because counsel for Ms. Rostropovich have confirmed in motion papers just filed in state court that they intend to file a motion for a stay of this federal action based upon the federal absention doctrine in light of prior, ongoing and related state court proceedings. If granted, Ms. Rostropovich's motion may moot this federal action. I am advised that counsel for Ms. Rostropovich intend to submit a request to the Court for a pre-motion conference very shortly.

With respect to the cross-claim of Ms. Rostropovich, the CGK Defendants previously have sought this relief from the Court on two occasions, and with respect to the cross-claim of the Mamdani Defendants, the CGK Defendants previously have sought this relief from

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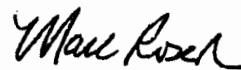
the Court on three occasions. The granting of the requested extensions will not affect any other scheduled dates in this litigation.

In addition, counsel for Ms. Rostropovich has requested that their time to respond to the cross-claim by the Mamdani Defendants be extended through August 29, 2008 as well. Counsel for Ms. Rostropovich previously has sought this relief from the Court on two occasions.

Counsel for Ms. Rostropovich and the Mamdani Defendants each have consented to the requested extensions.

Accordingly, the CGK Defendants respectfully request that their time to reply to the cross-claims of Ms. Rostropovich and the Mamdani Defendants be extended through August 29, 2008, and Ms. Rostropovich requests that her time to reply to the cross-claim of the Mamdani Defendants be extended through August 29, 2008.


Yours respectfully,



Marc R. Rosen

Encl.

cc: Avery Mehlman (via facsimile)  
Leo Kayser (via facsimile)  
Declan Redfern (via facsimile)  
Edward Rubin (via facsimile)

<i>Request GRANTED. The time for <del>defendants</del> Cooley Godward Kronish and Renee Schwartz to reply to the cross-claims of <del>defendants</del> Olga Rostropovich and Alana and Mahmoud Mamdani is extended to 8-29-08, and the time for <del>defendant</del> Rostropovich to reply to the cross-claim of the Mamdani defendants is similarly extended.</i>	
SO ORDERED:	
7-21-08	
DATE	VICTOR MARRERO, U.S.D.J.